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6 **UNITED STATES DISTRICT COURT**
7 **DISTRICT OF NEVADA**

8 UNITED STATES OF AMERICA,

9 Plaintiff,

10 v.

11 ROY DEAN GRACE,

12 Defendant.

Case No. 2:96-cr-00075-KJD-LRL

STIPULATION TO CONTINUE TIME
FOR FILING RESPONSIVE
PLEADINGS
(First Request)

14 IT IS HEREBY STIPULATED AND AGREED, by and between United States
15 Attorney Nicholas A. Trutanich and Assistant United States Attorney Elizabeth O. White,
16 counsel for the United States of America, and Federal Public Defender Rene L. Valladares and
17 Assistant Federal Public Defender Sylvia A. Irvin, on behalf of Defendant Roy Dean Grace¹,
18 that the Government's response that is due today should be continued for sixty days (60) days.

19 This Stipulation is entered into for the following reasons:

20 1. On April 12, 2019, Mr. Grace filed a "Motion for Imposition of Sentence
21 Reduction" asking the Court to consider his eligibility for relief under the First Step Act. ECF
22 No. 426.

23 2. The Government's Response to that Motion is due today.
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26 ¹ Along with this Stipulation, defense counsel has filed a Motion for Appointment of
Counsel for the limited purpose of determining Mr. Grace's eligibility for relief under the First
Step Act.

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2 3. Both counsel ask the Court for additional time for responsive pleadings to be
3 filed in this matter. The additional time will allow both counsel to review and determine Mr.
4 Grace's eligibility for relief under the First Step Act.

5 4. Should counsel agree as to eligibility, then a Stipulation will filed as to eligibility
6 and relief.

7 5. Should counsel not agree as to eligibility, then defense counsel will file a
8 Memorandum in support of Mr. Grace's motion and government counsel will respond with her
9 own Motion.

10 6. The parties agree to the continuance.

11 This is the first stipulation to continue the date for filing a responsive pleading.

12 DATED this 26th day of April, 2019.

13
14 RENE L. VALLADARES
15 Federal Public Defender

NICHOLAS A. TRUTANICH
United States Attorney

16 By /s/ Sylvia A. Irvin

By /s/ Elizabeth O. White

17 SYLVIA A. IRVIN
18 Assistant Federal Public Defender

ELIZABETH O. WHITE
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 ROY DEAN GRACE,

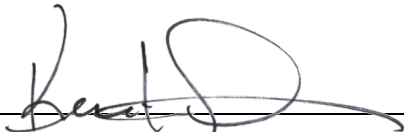
7 Defendant.

Case No. 2:96-cr-00075-KJD-LRL

ORDER

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10 IT IS THEREFORE ORDERED that the time for filing the responsive pleadings in this
11 case, be extended from today, April 26, 2019, and continued to June 25, 2019, or to a
12 time and date convenient to the Court but no sooner than sixty (60) days from today.

13 DATED this 29th day of April, 2019.

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16 UNITED STATES DISTRICT JUDGE